## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

CarePoint Health Systems Inc. d/b/a Just Health	X Chapter 11 Case No. 24-12534 (JKS)  (Jointly Administered)
Debtors.	: :

# SECOND AMENDED<sup>2</sup> NOTICE OF AGENDA REGARDING MATTERS SCHEDULED FOR HEARING ON APRIL 10, 2025 AT 9:30 A.M. (ET)<sup>3</sup>

## This proceeding will be conducted **in-person**.

All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.

Please refer to Judge Stickles' Chambers Procedures

(https://www.deb.uscourts.gov/content/judge-j-kate-stickles) and the Court's website (http://www.deb.uscourts.gov/ecourt-appearances) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the hearing unless otherwise noticed using the *eCourtAppearances* tool available on the Court's website.

<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Healthfor Medical Center (2063).The address CarePoint Health Systems 308 Willow Avenue, Hoboken, NJ 07030.

<sup>&</sup>lt;sup>2</sup> All amendments are highlighted in **Bold**.

<sup>&</sup>lt;sup>3</sup> All motions and other pleadings referenced herein are available online at the following web address: <a href="https://dm.epiq11.com/CarePoint">https://dm.epiq11.com/CarePoint</a>

## I. <u>CONTESTED MATTERS</u>

1. Confirmation hearing regarding the Sixth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/02/2025; D.I. 1072].

#### Related Documents:

- A. Redline of Fifth Amended Combined Disclosure Statement and Plan to Sixth Amended Combined Disclosure Statement and Plan [Filed: 04/02/2025; D.I. 1073].
- B. Proposed Findings of Fact, Conclusions of Law, and Order Confirming Sixth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/04/2025; D.I. 1085].
- C. Declaration of Shamiq Syed in Further Support of Confirmation [Filed: 04/04/2025; D.I. 1086].
- D. Supplemental Declaration of Emily Young of Epiq Corporate Restructuring, LLC Regarding Voting and Tabulation of Ballots Cast on the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/05/2025; D.I. 1087].

Objection Deadline: April 8, 2025 at 11:59 p.m. The reply deadline for the Plan Proponents is set for April 9, 2025 at 9:00 p.m.

## Objections/Responses Received:

- E. Limited Objection and Reservation of Rights of Creditor, Resolute Perioperative Services, LLC to the Approval of the Sixth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/07/2025; D.I. 1091].
- F. Objection of Access Information Management Corporation to Confirmation of Sixth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/08/2025; D.I. 1124].
- G. Maple Healthcare, LLC's Supplemental Objection to Sixth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/08/2025; D.I. 1125].
- H. Supplemental Objection of CarePoint Health Captive Assurance Company, LLC to Final Approval and Confirmation of the Sixth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/08/2025; D.I. <u>1126</u>].

I. Joinder [of Freehold Entities] to Objections of Captive and Maple to Sixth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/08/2025; D.I. 1127].

## **Additional Documents:**

- J. Seventh Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/09/2025; D.I. 1131].
- K. Redline of Sixth to Seventh Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/09/2025; D.I. 1132].
- L. Proposed Findings of Fact, Conclusions of Law, and Order Confirming Seventh Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 04/09/2025; D.I. 1133].
- M. Debtors' Reply to the Confirmation Objections of CarePoint Health Captive Assurance Company, LLC, Maple Healthcare, LLC, and the Freehold Entities [Filed: 04/09/2025; D.I. 1134].

<u>Status:</u> The Debtors seek confirmation of the **Seventh** Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization. This matter is going forward. **The Plan Proponents have resolved the objection of Resolute Perioperative Services, LLC;** the objection of Access Information Management Corporation will likely be resolved; the objections of Maple Healthcare, LLC, CarePoint Health Captive Assurance, and the Freehold Entities will not be resolved prior to the hearing.

## **Witness List:**

Witness Name	Party for
Emily Young, Director for Epiq Corporate Restructuring, LLC	Debtor
Shamiq Syed, Chief Financial Officer for the Debtors	Debtor

Dated: April 9, 2025 DILWORTH PAXSON LLP

## /s/ Peter C. Hughes

Peter C. Hughes (DE 4180) 800 N. King Street, Suite 202

Wilmington, DE 19801

Telephone: 302-571-9800 Facsimile: 302-571-8875

Email: phughes@dilworthlaw.com

and

Lawrence G. McMichael (admitted pro hac vice)

Peter C. Hughes (DE 4180)

Anne M. Aaronson (admitted *pro hac vice*)

Jack Small (admitted pro hac vice)

1650 Market St., Suite 1200

Philadelphia, PA 19103

Telephone: (215) 575-7000 Facsimile: (215) 754-4603

Email: lmcmichael@dilworthlaw.com
Email: phughes@dilworthlaw.com
Email: aaaronson@dilworthlaw.com
Email: jsmall@dilworthlaw.com

Counsel for the Debtors